

March 30, 2021

Maribeth Greenslade  
Water Quality Division  
Arizona Department of Environmental Quality  
1110 West Washington Street  
Phoenix, Arizona 85007

Re: Potential Alert Level Exceedance for Magnesium at Monitor Well O49-GL(R)  
APP No. P-101704, LTF 88102

Florence Copper has become aware of a potential exceedance for magnesium at monitor well O49-GL(R) based on the alert level (AL) listed in Aquifer Protection Permit (APP) No. P-101704. The magnesium result for well O49-GL(R) during the 1<sup>st</sup> Quarter 2021 sampling event was 8.4 mg/L, and the AL is 6.2 mg/L in Table 13 of the APP. However, Florence Copper believes this is a typographical error, and the AL value should be 18 mg/L instead of 6.2 mg/L. This is based on a review of the October 2017 version of APP No. P-101704 (prior to the 2020 significant amendment), and a review of the original ambient water quality data and AL calculations.

The biennial compliance monitoring tables (Table 4.6) in the October 2017 APP show an AL for magnesium of 18 mg/L for well O49-GL(R). There is, however, an internal discrepancy between the biennial tables and the quarterly monitoring table in this permit: the quarterly compliance monitoring table (Table 4.5) shows an AL for magnesium of 6.2 mg/L. This discrepancy led to a review of the original ambient water quality data and the AL calculations for magnesium in this well. In 2011, Florence Copper submitted the ambient data and the AL calculations for this well to ADEQ, and the AL for magnesium was listed as 18 mg/L. (*Temporary APP Application, Exhibit 15A - Table 1*). The SMRFs for the 2017 version of the APP also listed 18 mg/L for the AL for magnesium in O49-GL(R). Based on the review of this information, Florence Copper believes the magnesium AL for well O49-GL(R) should be 18 mg/L, and does not think the exceedance described above is reportable.

Please feel free to contact me if you require any additional information or have any questions.

Sincerely,



Brent Berg  
General Manager

cc: Tracy Bunch, ADEQ  
Nancy Rumrill, EPA Region 9